

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

- v. -

MICHAEL SHVARTSMAN,
GERALD SHVARTSMAN, and
BRUCE GARELICK,
Defendants.

Case No.: 23-CR-307 (LJL)

DECLARATION OF ALEXANDRA A.E. SHAPIRO

Pursuant to 28 U.S.C. §1746, Alexandra A.E. Shapiro, states and declares as follows:

1. I am a member of the law firm Shapiro Arato Bach LLP, counsel for Defendant Bruce Garelick in this action. I make this declaration in support of Mr. Garelick's Motion to Suppress and for a Bill of Particulars.¹

2. Attached as Exhibit 1 is a true and correct copy of a search warrant issued by the Honorable Marcia M. Henry in the Eastern District of New York on December 29, 2021 and supporting affidavit, as they were produced by the government (SDNY_01_00818983-SDNY_01_00819024).

3. Attached as Exhibit 2 is a true and correct copy of an FD-302 note dated January 5, 2022, as it was produced by the government (SDNY_01_00820944).

¹ Pursuant to Federal Rule of Civil Procedure 5.2 and the Southern District's ECF Privacy Policy, we have redacted sensitive personal information and personal identifying numbers from the exhibits to this Declaration.

4. Attached as Exhibit 3 is a true and correct copy of an image produced by the government as SDNY_01_00820987_141.
5. Attached as Exhibit 4 is a true and correct copy of an FD-302 note dated January 5, 2022, as it was produced by the government (SDNY_01_00820988).
6. Attached as Exhibit 5 is a true and correct copy of a search warrant issued by the Honorable Patricia A. Sullivan in the District of Rhode Island on June 14, 2022 and supporting affidavit, as they were produced by the government (SDNY_01_00819290-SDNY_01_00819372).
7. Attached as Exhibit 6 is a true and correct copy of an agent affidavit supporting an application for a search warrant for various Apple and Google accounts dated February 10, 2022 as it was produced by the government (SDNY_01_00819025-SDNY_01_00819071).
8. Attached as Exhibit 7 is a true and correct copy of an application for a search warrant for various Google accounts dated February 10, 2022, as it was produced by the government (SDNY_01_00818903-SDNY_01_00818911).
9. Attached as Exhibit 8 is a true and correct copy of an application for a search warrant for various Google accounts dated February 15, 2022, as it was produced by the government (SDNY_01_00818922-SDNY_01_00818978).
10. Attached as Exhibit 9 is a true and correct copy of an agent affidavit supporting an application for a search warrant for a Google account dated May 25, 2022, as it was produced by the government (SDNY_01_00819179-SDNY_01_00819225).
11. Attached as Exhibit 10 is a true and correct copy of a letter my partner, Jonathan P. Bach, sent to the government's attorneys on October 2, 2023.

12. Attached as Exhibit 11 is a true and correct copy of a letter the government sent to counsel for Mr. Garelick on October 23, 2023.

13. Attached as Exhibit 12 is a true and correct copy of an email from the government's attorney to counsel for Mr. Garelick on November 7, 2023.

14. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 22, 2023

/s/ Alexandra A.E. Shapiro
Alexandra A.E. Shapiro